## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

Sable Networks, Inc. and Sable IP, LLC,

Plaintiffs,

v.

Cloudflare, Inc.,

Defendant.

Civil Action No. 6:21-cy-00261-ADA

**JURY TRIAL DEMANDED** 

## DEFENDANT CLOUDFLARE, INC.'S STATUS REPORT REGARDING MOTION TO TRANSFER VENUE

Pursuant to the Court's Second Amended Standing Order Regarding Motions for Inter-District Transfer, Defendant Cloudflare, Inc. ("Cloudflare") provides this Status Report Regarding Motion to Transfer Venue:

On September 1, 2021, Cloudflare filed its Opposed Motion to Transfer Venue (the "Motion"). See ECF No. 26. As of today (i.e., four weeks prior to the date of the Markman hearing), the Motion is not fully briefed. Plaintiffs have not filed their Response to the Motion. Cloudflare anticipates that Plaintiffs will file their Response to the Motion within fourteen days after the deposition of Cloudflare's Chief Executive Officer. See ECF No. 39. Cloudflare will file its Reply within the later of fourteen days after (i) Plaintiffs' Response or (ii) the deposition of Plaintiff's Rule 30(b)(6) venue witness. Id.

Dated: December 15, 2021

Respectfully submitted,

STEVEN CALLAHAN

Texas State Bar No. 24053122 scallahan@ccrglaw.com

CHRISTOPHER T. BOVENKAMP

Texas State Bar No. 24006877 cbovenkamp@ccrglaw.com

ANTHONY M. GARZA

Texas State Bar No. 24050644

agarza@ccrglaw.com

C. LUKE NELSON

Texas State Bar No. 24051107

lnelson@ccrglaw.com

JOHN HEUTON

jhueton@ccrglaw.com

CHARHON CALLAHAN

ROBSON & GARZA, PLLC

3333 Lee Parkway, Suite 460

Dallas, Texas 75219

Telephone: (214) 521-6400

Telecopier: (214) 764-8392

Counsel for Defendant Cloudflare, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that, on December 15, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Dorian S. Berger, Esq. Daniel P. Hipskind, Esq. BERGER & HIPSKIND LLP 9538 Brighton Way, Ste. 320 Beverly Hills, California 90210

Telephone: 323-886-3430 Telecopier: 323-978-5508 dsb@bergerhipskind.com dph@bergerhipskind.com Elizabeth L. DeRieux, Esq. CAPSHAW DERIEUX, LLP 114 E. Commerce Ave. Gladewater, Texas 75647 Telephone: 903-845-5770 ederieux@capshawlaw.com

t Cl Cl